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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**TWENTY-FIFTH MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD OCTOBER 1, 2021 THROUGH OCTOBER 31, 2021**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	October 1, 2021 through October 31, 2021
Amount of compensation sought as actual, reasonable, and necessary:	\$559,928.00 (80% of \$699,910.00)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$1,818.99 (100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this twenty-fifth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing October 1, 2021 through October 31, 2021 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$699,910.00 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$559,928.00.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$814.60. The blended hourly rate of paraprofessionals during the Application Period is \$267.71.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$1,818.99 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$1,818.99.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$599,928.00 (80% of \$699,910.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$1,818.89 (100%), for a total amount of \$561,746.99, for the Application Period.

Dated: January 4, 2022
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A001	Asset Analysis & Recovery	27.5	\$23,664.00
A004	Case Administration	12.6	\$2,457.00
A006	Employment / Fee Applications	1.7	\$493.00
A009	Meetings / Communications with AHC & Creditors	4.9	\$4,572.50
A019	Plan of Reorganization / Disclosure Statement	118.6	\$143,120.00
A020	Insurance Adversary Proceeding	840.0	\$525,603.50
		1,005.3	\$699,910.00

Exhibit B

Summary of Compensation by Professional

SUMMARY OF COMPENSATION BY PROFESSIONAL

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,700.00	49.5	\$84,150.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,400.00	101.3	\$141,820.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,350.00	45.6	\$61,560.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,100.00	2.7	\$2,970.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$800.00	110.5	\$88,400.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia – 2019	\$725.00	58.3	\$42,267.50
Emily Grim	Partner / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020 U.S. Court of Appeals for the Federal Circuit - 2021	\$700.00	5.6	\$3,920.00
Dan Wolf	Partner / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$700.00	7.5	\$5,250.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia - 2017	\$675.00	83.0	\$56,025.00
Meredith Neely	Associate / Commonwealth of Virginia – 2018 District of Columbia - 2018	\$625.00	5.8	\$3,625.00

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$575.00	82.9	\$47,667.50
Alison Gaske	Associate / District of Columbia – 2016	\$575.00	44.6	\$25,645.00
Ethan Kaminsky	Associate / State of New York – 2018	\$500.00	35.9	\$17,950.00
Christian Carey	Associate / District of Columbia – 2020	\$425.00	66.9	\$28,432.50
John Girgenti	Staff Attorney / State of New York – 2002 District of Columbia – 2007	\$365.00	87.6	\$31,974.00
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$425.00	6.2	\$2,635.00
Alyssa Bonesteel	eDiscovery Specialist – Joined firm in 2018	\$315.00	24.2	\$7,623.00
Stephanie Colcock	Paralegal – Joined firm in 2020	\$330.00	10.3	\$3,399.00
Lauren Fastenau	Paralegal – Joined firm in 2019	\$315.00	57.6	\$18,144.00
Katherine Johnson	Paralegal – Joined firm in 2018	\$230.00	57.4	\$13,202.00
David Lopez	Paralegal – Joined firm in 2019	\$230.00	15.5	\$3,565.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$230.00	13.6	\$3,128.00
Patrick McGlinchey	Paralegal – Joined firm in 2020	\$	11.1	\$
Michael Lloyd	Project Assistant – Joined firm in 2021	\$195.00	6.0	\$1,170.00
Carmen Turner	Project Assistant – Joined firm in 2021	\$195.00	14.0	\$2,730.00
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$290.00	1.7	\$493.00
	Totals		1,005.3	\$699,910.00
	Attorney Blended Rate	\$814.60		
	Paraprofessional Blended Rate	\$267.71		

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Westlaw	\$1,818.99
Total	\$1,818.99

Exhibit D

Time and Expense Detail

GILBERT LLP

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Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

January 3, 2022
Invoice Number: 11324866
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through October 31, 2021

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	699,910.00	1,818.99	701,728.99
Total	699,910.00	1,818.99	701,728.99
TOTAL FEES			\$ 699,910.00
TOTAL EXPENSES			<u>\$ 1,818.99</u>
TOTAL FEES AND EXPENSES			\$ 701,728.99

FOR PROFESSIONAL SERVICES RENDERED through October 31, 2021

Purdue Bankruptcy

A001: Asset Analysis & Recovery

Name	Date	Services	Hours	Amount
Ogrey, S.	10/01/21	Draft tracking sheet for insurer issue memoranda.	.80	184.00
Gilbert, S.	10/04/21	Confer with team re insurance strategy.	.40	680.00
Shore, R.	10/04/21	Confer with team re insurance recovery strategy.	.40	540.00
Shore, R.	10/04/21	Review presentation re settlement demands.	.30	405.00
Hudson, J.	10/04/21	Confer with team re insurance recovery strategy.	.40	290.00
Hudson, J.	10/04/21	Analyze insurance settlement demand figures.	.20	145.00
Grim, E.	10/04/21	Confer with team re insurance strategy.	.40	280.00
Rubinstein, J.	10/04/21	Confer with team re status of insurance recovery efforts.	.40	320.00
Wolf, D.	10/04/21	Confer with S. Gilbert, R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, E. Grim, S. Sraders, A. Gaske, and E. Kaminsky re insurance recovery strategy.	.40	280.00
Gaske, A.	10/04/21	Confer with team re recovery strategy.	.40	230.00
Sraders, S.	10/04/21	Confer with team re current status and next steps.	.40	230.00
Kaminsky, E.	10/04/21	Confer with team re insurance strategy.	.40	200.00
Hudson, J.	10/05/21	Analyze next steps for insurance settlement negotiations.	.30	217.50
Hudson, J.	10/06/21	Review insurance settlement demand analysis.	.50	362.50
Hudson, J.	10/07/21	Revise insurance settlement demand analysis.	.70	507.50
Sraders, S.	10/07/21	Draft chart re insurance-related findings in bankruptcy proceedings.	.90	517.50
Gilbert, S.	10/08/21	Analyze status and strategy re insurance settlement issues.	1.00	1,700.00
Shore, R.	10/08/21	Review insurance settlement demands and related issues (0.9); revise trustee presentation (0.6).	1.50	2,025.00
Hudson, J.	10/08/21	Analyze approach to insurance settlement demands.	.90	652.50
Sraders, S.	10/08/21	Finalize and circulate chart with insurance-related findings.	.20	115.00
Hudson, J.	10/13/21	Revise insurance settlement numbers to reflect continued analysis.	.30	217.50
Hudson, J.	10/14/21	Analyze insurance recovery strategy.	.10	72.50

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Name	Date	Services	Hours	Amount
Gilbert, S.	10/15/21	Analyze insurance strategy.	1.00	1,700.00
Hudson, J.	10/17/21	Analyze next steps for insurance recovery.	.40	290.00
Hudson, J.	10/18/21	Analyze next steps for insurance recovery.	.20	145.00
Girgenti, J.	10/19/21	Communications with J. Hudson and M. Rush re products marketed by Purdue.	.20	73.00
Girgenti, J.	10/19/21	Research re specific products marketed by Debtors.	.30	109.50
Rush, M.	10/19/21	Research list of Purdue drugs.	.70	472.50
Gilbert, S.	10/20/21	Confer with insurance team re strategy.	.40	680.00
Shore, R.	10/20/21	Confer with team re insurance recovery strategy.	.40	540.00
Hudson, J.	10/20/21	Confer with team re insurance recovery efforts.	.40	290.00
Girgenti, J.	10/20/21	Research re specific products marketed by Debtors.	.30	109.50
Grim, E.	10/20/21	Confer with team re insurance recovery strategy.	.40	280.00
Gaske, A.	10/20/21	Confer with team re insurance recovery strategy and case status.	.40	230.00
Leveridge, R.	10/20/21	Confer with team re insurance recovery strategy.	.40	560.00
Hudson, J.	10/21/21	Revise settlement strategy materials for meeting with AHC working group.	.10	72.50
Hudson, J.	10/21/21	Communicate with S. Gilbert re insurance settlement strategy.	.10	72.50
Shore, R.	10/22/21	Confer with team re case status and strategy.	.40	540.00
Hudson, J.	10/22/21	Confer with team re status and strategy.	.40	290.00
Wolf, D.	10/22/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, S. Sraders, A. Gaske, E. Kaminsky, K. Johnson and S. Colcock re insurance recovery strategy.	.40	280.00
Rush, M.	10/22/21	Confer with team re insurance recovery strategy.	.40	270.00
Johnson, K.	10/22/21	Confer with J. Rubinstein, R. Leveridge, J. Hudson, R. Shore, M. Rush, D. Wolf, S. Sraders, A. Gaske, E. Kaminsky, and S. Colcock re status and strategy.	.40	92.00
Gaske, A.	10/22/21	Confer with team re insurance recovery strategy and status of case.	.40	230.00
Leveridge, R.	10/22/21	Confer with team re insurance recovery status.	.40	560.00
Sraders, S.	10/22/21	Confer with team re insurance recovery status and next steps.	.40	230.00
Colcock, S.	10/22/21	Confer with M. Rush, K. Johnson, J. Hudson, J. Rubinstein, A. Gaske, E. Kaminsky, R. Leveridge, R. Shore, S. Sraders and D. Wolf re case strategy and updates.	.40	132.00
Kaminsky, E.	10/22/21	Confer with team re insurance status and strategy.	.40	200.00
Gilbert, S.	10/25/21	Confer with team re insurance strategy.	.30	510.00

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Name	Date	Services	Hours	Amount
Hudson, J.	10/25/21	Confer with team re next steps for insurance recovery.	.20	145.00
Gaske, A.	10/25/21	Confer with team re case updates and strategy.	.30	172.50
Leveridge, R.	10/25/21	Confer with team re case status and strategy.	.30	420.00
Sraders, S.	10/25/21	Confer with team re next steps for insurance recovery.	.30	172.50
Kaminsky, E.	10/25/21	Confer with team re case status and strategy.	.30	150.00
Wolf, D.	10/26/21	Draft summary re status of insurance recovery work.	.40	280.00
Sraders, S.	10/28/21	Review documents re claims by personal injury claimants.	.40	230.00
Gilbert, S.	10/29/21	Confer with team re insurance strategy.	.40	680.00
Hudson, J.	10/29/21	Confer with insurance team re recovery strategy.	.40	290.00
Wolf, D.	10/29/21	Confer with S. Gilbert, R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, S. Sraders, and A. Gaske re insurance recovery strategy.	.40	280.00
Rush, M.	10/29/21	Confer with team re case status and strategy.	.40	270.00
Johnson, K.	10/29/21	Confer with S. Gilbert, R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, D. Wolf, A. Gaske, M. Rush, S. Sraders, E. Kaminsky, and S. Colcock re status and strategy.	.40	92.00
Gaske, A.	10/29/21	Confer with team re insurance strategy and case update.	.40	230.00
Leveridge, R.	10/29/21	Confer with team re insurance recovery strategy.	.40	560.00
Sraders, S.	10/29/21	Confer with team re ongoing insurance recovery efforts and next steps.	.40	230.00
Colcock, S.	10/29/21	Confer with M. Rush, K. Johnson, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Girgenti, E. Kaminsky, R. Leveridge, R. Shore and D. Wolf re case strategy and updates.	.40	132.00
Kaminsky, E.	10/29/21	Confer with team re insurance litigation strategy and status.	.40	200.00
Project Total:			27.50	\$ 23,664.00

A004: Case Administration

Name	Date	Services	Hours	Amount
Lloyd, M.	10/01/21	Review bankruptcy and adversary dockets for recently filings; draft summary of same.	.70	136.50
Lloyd, M.	10/04/21	Review bankruptcy and adversary dockets for recent filings (1.6); draft summary of same (1.4).	3.00	585.00

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Name	Date	Services	Hours	Amount
Lloyd, M.	10/12/21	Review bankruptcy and adversary dockets for recent filings (0.9); draft summary of same (1.4).	2.30	448.50
Turner, C.	10/15/21	Review insurance-related pleadings filed in the bankruptcy and adversary proceeding.	.80	156.00
Turner, C.	10/18/21	Calendar recent case deadlines.	.20	39.00
Turner, C.	10/18/21	Review insurance-related pleadings recently filed in the bankruptcy and adversary proceedings.	2.80	546.00
Turner, C.	10/20/21	Calendar recent deadlines and upcoming hearings in case.	.40	78.00
Turner, C.	10/25/21	Review insurance-related pleadings in bankruptcy and adversary proceedings.	2.40	468.00
Project Total:			12.60	\$ 2,457.00

A006: Employment / Fee Applications

Name	Date	Services	Hours	Amount
Holland, P.	10/04/21	Revise August fee statement.	.80	232.00
Holland, P.	10/05/21	Finalize August fee statement and key (0.8); communicate with US Trustee and Fee Examiner re same (0.1).	.90	261.00
Project Total:			1.70	\$ 493.00

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	10/06/21	Confer with AHC re plan and litigation.	.80	1,360.00
Sraders, S.	10/06/21	Confer with AHC re current status of proceedings in bankruptcy and district courts.	.80	460.00
Sraders, S.	10/06/21	Draft summary of conference with AHC members.	.90	517.50
Quinn, K.	10/13/21	Confer with Committee re case status.	.60	660.00
Shore, R.	10/13/21	Confer with AHC re case status and strategy.	.60	810.00
Grim, E.	10/13/21	Confer with AHC re appeal status and strategy.	.60	420.00
Sraders, S.	10/13/21	Confer with AHC re recent developments on appeal and next steps in case.	.60	345.00
Project Total:			4.90	\$ 4,572.50

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A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Gilbert, S.	10/01/21	Confer with co-counsel re appellate issues.	.40	680.00
Shore, R.	10/04/21	Confer with co-counsel re appeal process.	.90	1,215.00
Hudson, J.	10/04/21	Confer with AHC counsel (Kramer Levin) re process for and impact of appeals of confirmation order.	.40	290.00
Hudson, J.	10/04/21	Review requests for direct appeal to the Second Circuit and stay implementation of the plan.	.10	72.50
Hudson, J.	10/04/21	Summarize potential process for and impact of appeals of confirmation order.	.10	72.50
Leveridge, R.	10/04/21	Analyze States' request for direct appeal to Second Circuit and related matters.	1.20	1,680.00
Sraders, S.	10/04/21	Confer with D. Blabey, R. Ringer, and C. Gange re appellate process.	.40	230.00
Gilbert, S.	10/05/21	Confer with MSGE re NAACP and trusts.	1.00	1,700.00
Gilbert, S.	10/05/21	Review trust materials.	1.30	2,210.00
Neely, M.	10/05/21	Review plan provisions re establishment of trusts and Tribe Trust agreements prior to insurance placement.	4.10	2,562.50
Wolf, D.	10/05/21	Review status of D&O procurement for post-bankruptcy trusts; review AON materials re same.	.40	280.00
Gilbert, S.	10/06/21	Confer with AHC representatives re trust issues (0.5); confer with K. Eckstein re trust issues (0.8).	1.30	2,210.00
Shore, R.	10/06/21	Confer with co-counsel re appeal and other issues.	1.00	1,350.00
Neely, M.	10/06/21	Confer with B. Kelly, S. Toomey, M. Brown, N. Brotto, and D. Wolf re insurance procurement.	.80	500.00
Wolf, D.	10/06/21	Confer with M. Brown, B. Kelly, and M. Neely re procurement of insurance to TAFT.	.80	560.00
Sraders, S.	10/06/21	Review correspondence and memorandum re appeals.	.40	230.00
Gilbert, S.	10/07/21	Confer with AHC working group re plan.	1.00	1,700.00
Gilbert, S.	10/07/21	Analyze next steps for trust insurance procurement.	1.00	1,700.00
Hudson, J.	10/07/21	Confer with AIG counsel and Debtors' counsel re insurance-related provisions of plan.	.20	145.00
Gilbert, S.	10/08/21	Confer with MSGE re trusts.	.70	1,190.00
Gilbert, S.	10/08/21	Confer with claimant counsel re plan issues.	1.00	1,700.00
Gilbert, S.	10/08/21	Continue analyzing next steps for trust insurance procurement.	1.00	1,700.00
Gilbert, S.	10/10/21	Confer with co-counsel re trust issues.	1.00	1,700.00
Gilbert, S.	10/11/21	Confer with AHC working group re plan and appeal.	.50	850.00

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Name	Date	Services	Hours	Amount
Gilbert, S.	10/11/21	Correspond with co-counsel re insurance procurement for trusts.	.80	1,360.00
Neely, M.	10/11/21	Confer with trustees, AON, B. Kelly, S. Toomey, D. Simon, and D. Wolf re insurance procurement.	.90	562.50
Wolf, D.	10/11/21	Confer with TAFT Trustees, AON, and B. Kelly re purchase of D&O insurance for trust.	.90	630.00
Gilbert, S.	10/12/21	Confer with team re appeal status and strategy.	.20	340.00
Gilbert, S.	10/12/21	Attend District Court hearing (partial).	1.00	1,700.00
Hudson, J.	10/12/21	Confer with team re appeals strategy.	.20	145.00
Hudson, J.	10/12/21	Begin drafting insurance insert for presentation to MDT Trustees.	.10	72.50
Grim, E.	10/12/21	Confer with team re appeal strategy.	.20	140.00
Grim, E.	10/12/21	Attend District Court scheduling conference.	2.10	1,470.00
Wolf, D.	10/12/21	Confer with S. Gilbert, R. Leveridge, J. Hudson, E. Grim, S. Sraders, A. Gaske, and E. Kaminsky re appeal strategy.	.20	140.00
Wolf, D.	10/12/21	Analyze information for underwriting requests re Trusts insurance procurement.	.40	280.00
Gaske, A.	10/12/21	Draft common interest language for presentation.	.80	460.00
Gaske, A.	10/12/21	Confer with team re appeal strategy and next steps.	.20	115.00
Leveridge, R.	10/12/21	Confer with team re appeal strategy.	.20	280.00
Sraders, S.	10/12/21	Confer with team re appeal strategy and next steps.	.20	115.00
Gilbert, S.	10/13/21	Confer with AHC working group re trusts.	.50	850.00
Hudson, J.	10/13/21	Continue drafting insurance insert for presentation to MDT Trustees.	.40	290.00
Gaske, A.	10/13/21	Draft common interest language for presentation.	1.50	862.50
Sraders, S.	10/13/21	Review District Court opinion denying U.S. Trustee motion for emergency stay.	.20	115.00
Gilbert, S.	10/14/21	Attend District Court hearing (partial).	1.00	1,700.00
Quinn, K.	10/14/21	Attend hearing re direct appeal issues (partial).	1.50	1,650.00
Shore, R.	10/14/21	Revise trustee presentation re coverage.	1.50	2,025.00
Hudson, J.	10/14/21	Confer with co-counsel for AHC re initial presentation to MDT re insurance.	.10	72.50
Hudson, J.	10/14/21	Revise insurance insert for initial presentation to MDT Trustees.	1.60	1,160.00
Hudson, J.	10/14/21	Update budget estimates for MDT.	1.00	725.00
Grim, E.	10/14/21	Attend hearing on motion to certify appeal to Second Circuit (partial).	1.10	770.00
Wolf, D.	10/14/21	Confer with S. Massman re procurement of D&O insurance for trusts and NewCo.	.20	140.00

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Name	Date	Services	Hours	Amount
Wolf, D.	10/14/21	Review status of D&O insurance recovery and defense costs re same.	.40	280.00
Leveridge, R.	10/14/21	Draft budget for litigation and arbitrations (3.3); draft correspondence to MDT re same (0.9).	4.20	5,880.00
Sraders, S.	10/14/21	Attend hearing re motion for direct certification (6.1); draft brief summary re same (0.3).	6.40	3,680.00
Gilbert, S.	10/15/21	Confer with Committees and NAACP re next steps..	1.00	1,700.00
Gilbert, S.	10/15/21	Confer with co-counsel re NAACP and trusts.	.50	850.00
Shore, R.	10/15/21	Review and provide comments to Trustee presentation.	2.00	2,700.00
Shore, R.	10/15/21	Review insurance-related appellate filings.	1.50	2,025.00
Hudson, J.	10/15/21	Update budget estimates for MDT.	3.80	2,755.00
Hudson, J.	10/15/21	Revise insurance insert for initial presentation to MDT Trustees.	.10	72.50
Rubinstein, J.	10/15/21	Prepare budget projections for MDT.	5.20	4,160.00
Leveridge, R.	10/15/21	Draft presentation to MDT re litigation budgeting.	3.60	5,040.00
Hudson, J.	10/16/21	Update budget estimates for MDT.	.50	362.50
Rubinstein, J.	10/16/21	Analysis re MDT budget projections.	.30	240.00
Leveridge, R.	10/16/21	Communications with team re presentation to MDT.	.80	1,120.00
Shore, R.	10/17/21	Confer with team re trustee presentation(s) and discovery issues.	1.00	1,350.00
Hudson, J.	10/17/21	Update budget estimates for MDT.	.60	435.00
Hudson, J.	10/17/21	Revise insurance portion of initial presentation to MDT Trustees.	1.10	797.50
Leveridge, R.	10/17/21	Communications with team re presentation to MDT (0.5); review revisions to same (0.9).	1.40	1,960.00
Gilbert, S.	10/18/21	Confer with co-counsel re MDT issues.	.80	1,360.00
Gilbert, S.	10/18/21	Attend MDT meeting (1.5); analyze next steps (1.0).	2.50	4,250.00
Hudson, J.	10/18/21	Confer with AHC co-counsel re initial MDT presentation.	.80	580.00
Gilbert, S.	10/19/21	Confer with AHC working group.	1.00	1,700.00
Gilbert, S.	10/19/21	Attend NOAT meeting.	1.50	2,550.00
Hudson, J.	10/19/21	Review plan provisions re payment of insurance collateral to MDT to confirm timing.	.20	145.00
Hudson, J.	10/19/21	Confer with Debtors (A. Kramer) re plan provisions re payment of insurance collateral to MDT to confirm timing.	.10	72.50
Wolf, D.	10/19/21	Confer with A. Kramer and S. Massman re procurement of trusts insurance policies.	.20	140.00
Wolf, D.	10/19/21	Review status re procurement of trusts insurance policies.	.20	140.00

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Name	Date	Services	Hours	Amount
Gilbert, S.	10/20/21	Confer with co-counsel re NOAT.	1.50	2,550.00
Gilbert, S.	10/20/21	Review status of insurance procurement for trusts.	2.00	3,400.00
Hudson, J.	10/20/21	Revise briefing book to MDT.	.20	145.00
Rush, M.	10/20/21	Research list of Purdue drugs for trust distribution procedures.	1.20	810.00
Gilbert, S.	10/21/21	Confer with counsel re trusts (1.2); confer with FTI re trusts (0.9); confer with AHC re trusts (0.9).	3.00	5,100.00
Gilbert, S.	10/21/21	Confer with Debtors re D&O NewCo issues.	1.00	1,700.00
Hudson, J.	10/21/21	Revise briefing book to MDT.	.50	362.50
Gilbert, S.	10/22/21	Confer with Committees and NAACP re trusts.	3.00	5,100.00
Wolf, D.	10/22/21	Review insureds defense costs re D&O insurance coverage.	.40	280.00
Hudson, J.	10/25/21	Confer with J. Peacock re insurance discussions.	.10	72.50
Gilbert, S.	10/26/21	Confer with AHC working group re trust issues.	1.00	1,700.00
Gilbert, S.	10/26/21	Confer with co-counsel re NOAT trust distribution procedures issues.	1.00	1,700.00
Gilbert, S.	10/26/21	Attend NOAT meeting.	2.00	3,400.00
Hudson, J.	10/26/21	Review plan-related documents to confirm extent of post-effective date cooperation to be provided by Debtors.	.20	145.00
Hudson, J.	10/26/21	Revise transfer agreement with Liberty re NewCo coverage to confirm MDT policies protected.	.70	507.50
Hudson, J.	10/26/21	Outline insurance 101 training for MDT Trustee.	.30	217.50
Wolf, D.	10/26/21	Revise Liberty Mutual agreement re extensions of certain current insurance policies.	.40	280.00
Gaske, A.	10/26/21	Review cooperation terms in the plan.	.30	172.50
Kaminsky, E.	10/26/21	Review Debtors' and insurer agreement for conflict with plan.	1.30	650.00
Gilbert, S.	10/27/21	Confer with MSGE re trusts issues.	1.00	1,700.00
Gilbert, S.	10/27/21	Confer with co-counsel re insurance procurement for trusts.	1.50	2,550.00
Gilbert, S.	10/27/21	Review financial projections for trusts.	.70	1,190.00
Hudson, J.	10/27/21	Revise insurance presentation for discussion with J. Peacock.	.50	362.50
Gilbert, S.	10/28/21	Confer with AHC working group re plan and trusts.	1.00	1,700.00
Gilbert, S.	10/28/21	Confer with co-counsel re NewCo insurance.	1.00	1,700.00
Gilbert, S.	10/28/21	Confer with co-counsel and client re NOAT issues.	1.00	1,700.00
Gilbert, S.	10/28/21	Confer with NCSG re trusts.	.50	850.00
Gilbert, S.	10/28/21	Confer with NOAT re trust issues.	1.00	1,700.00
Gilbert, S.	10/28/21	Confer with AHC re NOAT issues.	1.00	1,700.00

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Name	Date	Services	Hours	Amount
Shore, R.	10/28/21	Communicate with J. Hudson re insurance presentation for J. Peacock.	.40	540.00
Grim, E.	10/28/21	Review data for purposes of presentation to NewCo Board.	.20	140.00
Gilbert, S.	10/29/21	Confer with co-counsel re NOAT issues.	1.00	1,700.00
Shore, R.	10/29/21	Review policy summaries and status of proceedings in preparation for insurance presentation for J. Peacock.	1.10	1,485.00
Hudson, J.	10/29/21	Analyze Debtors' request re disclosure of policy evidence in connection with appeal.	1.00	725.00
Hudson, J.	10/29/21	Revise outline of insurance 101 training for MDT Trustee.	.10	72.50
Hudson, J.	10/29/21	Confer with insurers re potential disclosure of policy evidence in connection with appeal.	.40	290.00
Shore, R.	10/31/21	Review prior outlines re insurance basics (0.4); revise of outline presentation re same (1.6).	2.00	2,700.00
Wolf, D.	10/31/21	Review presentations and insurance policies re NewCo insurance procurement.	1.40	980.00
Project Total:			118.60	\$ 143,120.00

A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Shore, R.	10/01/21	Review and revise document requests, interrogatories, and requests for admission.	4.70	6,345.00
Girgenti, J.	10/01/21	Confer with R. Leveridge, M. Rush, S. Sraders, and C. Carey re review of insurer productions.	.70	255.50
Girgenti, J.	10/01/21	Review document requests sent to insurers (0.2); analyze and issue tag Navigators document production for relevance and responsive documents (1.5).	1.70	620.50
Rubinstein, J.	10/01/21	Revise sets of responses to discovery served on plaintiffs due October 4 (2.4); provide comments on ESI search terms circulated by Debtors' counsel (0.5); communications with co-counsel re document production issues (1.3); analysis re issues related to review of insurer productions (0.5)	4.70	3,760.00
Rush, M.	10/01/21	Outline strategy for document review.	3.40	2,295.00
Rush, M.	10/01/21	Review insurer discovery responses.	.30	202.50
Rush, M.	10/01/21	Confer with team re offensive discovery issues	.70	472.50
Rush, M.	10/01/21	Review proposed search terms.	.60	405.00

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Name	Date	Services	Hours	Amount
Johnson, K.	10/01/21	Confer with S. Colcock and A. Gaske re policy review in preparation for final stipulations (0.7); confer with S. Colcock re same (0.5); draft policy comparisons re National Union (3.1).	4.30	989.00
Johnson, K.	10/01/21	Review and organize Debtors' discovery correspondence.	.10	23.00
Gaske, A.	10/01/21	Communicate with team re missing prior settlement agreement; draft email requesting prior settlement agreement.	.40	230.00
Gaske, A.	10/01/21	Confer with K. Johnson and S. Colcock re policy comparison project.	.70	402.50
Gaske, A.	10/01/21	Confer with S. Colcock re upcoming policy review.	.50	287.50
Leveridge, R.	10/01/21	Communicate with Debtors' counsel re follow up with Navigators and proposed response.	.60	840.00
Leveridge, R.	10/01/21	Draft report to client re status of discovery.	2.10	2,940.00
Leveridge, R.	10/01/21	Analyze proposed responses to discovery from Gulf and St. Paul (4.1); communications with co-counsel re same (0.4); confer with co-counsel for Ad Hoc Committee re same (0.4).	4.90	6,860.00
Leveridge, R.	10/01/21	Meet with team re offensive discovery status.	.70	980.00
Ogrey, S.	10/01/21	Review missing correspondence re insurer correspondence issue list to identify what remaining correspondence needs to be requested.	1.90	437.00
Carey, C.	10/01/21	Confer with R. Leveridge, M. Rush, S. Sraders, and J. Girgenti re Issue #32.	.70	297.50
Carey, C.	10/01/21	Analyze meeting notes and materials re Issue #32.	2.20	935.00
Sraders, S.	10/01/21	Confer with R. Leveridge, M. Rush, J. Girgenti, and C. Carey re review of insurer-produced documents.	.70	402.50
Sraders, S.	10/01/21	Review proposed search terms in response to document requests from Insurers #5 and #36.	.50	287.50
Sraders, S.	10/01/21	Analyze Debtors' policies to determine factual bases for research Issues #3 and #44.	3.40	1,955.00
Colcock, S.	10/01/21	Confer with A. Gaske and K. Johnson re policy comparison in anticipation for policy stipulation.	.60	198.00
Colcock, S.	10/01/21	Confer with A. Gaske re case status and insurance review projects.	.50	165.00
Colcock, S.	10/01/21	Confer with K. Johnson re policy comparison in anticipation for policy stipulation.	.50	165.00
Rubinstein, J.	10/02/21	Review proposed revisions to responses to Gulf and St. Paul requests for production.	.20	160.00
Leveridge, R.	10/02/21	Review revised responses to document requests from Gulf and St. Paul (0.5); communications with Debtors' counsel re same (0.2).	.70	980.00

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Name	Date	Services	Hours	Amount
Shore, R.	10/03/21	Revise discovery responses.	.50	675.00
Shore, R.	10/04/21	Revise discovery-related correspondence with Navigators.	.90	1,215.00
Hudson, J.	10/04/21	Analyze responses to insurer discovery requests.	.50	362.50
Hudson, J.	10/04/21	Review pleadings re motion to withdraw the reference.	.10	72.50
Hudson, J.	10/04/21	Communicate with R. Leveridge re search terms and defensive discovery strategy.	.10	72.50
Hudson, J.	10/04/21	Review draft response to Navigators' request re AHC position.	.10	72.50
Girgenti, J.	10/04/21	Continue to analyze and issue tag Navigator document production for relevance and responsive documents.	6.70	2,445.50
Rubinstein, J.	10/04/21	Analyze response to insurer requests for production of documents (1.2); communicate with A. Gaske re historic communications with insurers (0.6); analyze discovery correspondence from insurers (0.6); analyze offensive discovery (0.4).	2.80	2,240.00
Rush, M.	10/04/21	Analyze research re Issue #32.	2.40	1,620.00
Rush, M.	10/04/21	Confer with C. Carey re Issue #32.	.40	270.00
Rush, M.	10/04/21	Review insurance policies.	1.80	1,215.00
Rush, M.	10/04/21	Review discovery letter from insurers.	.40	270.00
Rush, M.	10/04/21	Analyze research re Issue #14.	1.70	1,147.50
Johnson, K.	10/04/21	Review and organize plaintiffs' responses to various Gulf and St. Paul discovery requests.	.10	23.00
Johnson, K.	10/04/21	Confer with L. Fastenau re policy review in preparation for final stipulations (0.5); draft policy comparisons re National Union (3.7).	4.20	966.00
Gaske, A.	10/04/21	Draft overview of policy comparison project (0.5); draft template email re policy stipulations (0.2).	.70	402.50
Gaske, A.	10/04/21	Review research re mediation privilege and Rule 408.	.40	230.00
Gaske, A.	10/04/21	Review analysis of missing correspondence.	.60	345.00
Leveridge, R.	10/04/21	Draft response by Committees to follow discovery from Navigators (1.4); communications with Debtors' and UCC counsel re same (0.6); confer with team re litigation status and strategy (0.4).	2.40	3,360.00
Leveridge, R.	10/04/21	Communicate with Ad Hoc Committee counsel re discovery in adversary proceeding.	.90	1,260.00
Ogrey, S.	10/04/21	Continue identifying correspondence list of insurance-related deposition topics.	2.30	529.00

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Name	Date	Services	Hours	Amount
Ogrey, S.	10/04/21	Review and organize 7/1 correspondence sent to all Debtors' insurers.	.90	207.00
Fastenau, L.	10/04/21	Confer with K. Johnson re policy review project.	.50	157.50
Fastenau, L.	10/04/21	Review and compare AGLIC policies with produced versions.	2.00	630.00
Carey, C.	10/04/21	Analyze materials and strategy re Issue #32.	2.40	1,020.00
Carey, C.	10/04/21	Confer with M. Rush re Issue #32 research.	.40	170.00
Sraders, S.	10/04/21	Review policies from Insurers #18, #19, and #20 re Issue #3.	3.70	2,127.50
Quinn, K.	10/05/21	Confer with team re defense costs strategy.	.60	660.00
Hudson, J.	10/05/21	Confer with K. Quinn, R. Leveridge and E. Grim re defense cost-related arguments.	.60	435.00
Hudson, J.	10/05/21	Review status of research re Issue #54.	.10	72.50
Hudson, J.	10/05/21	Confer with Debtors' counsel (Reed Smith) re production in response to defense cost-related requests.	.30	217.50
Hudson, J.	10/05/21	Revise response to Navigators' discovery-related correspondence.	.10	72.50
Girgenti, J.	10/05/21	Continue to analyze and issue tag Navigators document production for relevance and responsive documents.	4.10	1,496.50
Girgenti, J.	10/05/21	Review cases relevant to insurer reimbursement of defense costs.	.60	219.00
Grim, E.	10/05/21	Confer with R. Leveridge, J. Hudson, and K. Quinn re analysis of defense cost issues.	.60	420.00
Rubinstein, J.	10/05/21	Confer with R. Leveridge re offensive and defensive discovery strategy (0.4); analysis re insurer discovery deficiencies and next steps (2.5); review correspondence re TIG arbitration (0.2); analysis re defense invoices production issue (0.6); confer with Debtors' counsel re Rhodes defense costs issue (0.3); revise draft discovery response to C. Sorensen (0.4); revise draft correspondence to insurers re policy stipulations (0.3).	4.70	3,760.00
Rush, M.	10/05/21	Analyze offensive discovery issues.	1.60	1,080.00
Rush, M.	10/05/21	Draft letter to insurers re discovery deficiencies.	2.30	1,552.50
Johnson, K.	10/05/21	Draft policy comparisons re XLIA.	4.90	1,127.00
Gaske, A.	10/05/21	Confer with E. Kaminsky re research projects.	.30	172.50
Gaske, A.	10/05/21	Review recently issued opinion in opioid coverage litigation case.	.20	115.00
Gaske, A.	10/05/21	Review confidentiality agreements and insurer-specific letters.	.30	172.50

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Name	Date	Services	Hours	Amount
Gaske, A.	10/05/21	Communicate with S. Ogrey and others re missing insurer correspondence.	.80	460.00
Leveridge, R.	10/05/21	Draft response to Navigators' discovery follow up (2.2); communications with Debtors' and UCC counsel re same (0.4); conference call with Debtors' counsel re defense costs discovery issue (0.6).	3.20	4,480.00
Ogrey, S.	10/05/21	Draft correspondence to Reed Smith re missing correspondence re depositions.	.40	92.00
Ogrey, S.	10/05/21	Review missing insurer correspondence re depositions.	.20	46.00
Fastenau, L.	10/05/21	Review and compare AGLIC policies with produced versions.	5.50	1,732.50
Carey, C.	10/05/21	Review Issue #32 materials.	5.60	2,380.00
Sraders, S.	10/05/21	Review correspondence and charts re insurer document requests and responses.	.30	172.50
Sraders, S.	10/05/21	Review policy provisions re Issues #3 and #44.	4.00	2,300.00
Kaminsky, E.	10/05/21	Confer with A. Gaske re insurance recovery research.	.30	150.00
Kaminsky, E.	10/05/21	Draft memorandum re Issue #1.	1.10	550.00
Kaminsky, E.	10/05/21	Research re Issue #25.	3.00	1,500.00
Hudson, J.	10/06/21	Draft responses to discovery requests from NA Elite and Aspen.	1.20	870.00
Girgenti, J.	10/06/21	Continue analyzing and issue tagging Navigators document production for relevance and responsive documents.	7.60	2,774.00
Rubinstein, J.	10/06/21	Analysis re Gulf and St. Paul document productions (0.3); communicate with M. Rush re deficiency letters to insurer defendants (0.7); revise responses to National Union interrogatories and requests for production of documents (1.0).	2.00	1,600.00
Rush, M.	10/06/21	Draft letter to insurers re insurers' discovery responses.	7.60	5,130.00
Rush, M.	10/06/21	Confer with C. Carey re document review.	.30	202.50
Johnson, K.	10/06/21	Communicate with A. Bonesteel re missing policies (0.5); communicate with L. Fastenau re policy review in preparation for final stipulations (0.2); continue drafting policy comparisons re XLIA (5.2).	5.90	1,357.00
Gaske, A.	10/06/21	Communicate with S. Ogrey re draft policy stipulation emails.	.40	230.00
Gaske, A.	10/06/21	Review database for certain missing policy.	.20	115.00
Gaske, A.	10/06/21	Review policies for certain language re memorandum on Issue #22 and related analyses.	1.60	920.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	10/06/21	Draft follow-up response to Navigators (1.3); communicate with co-counsel re same (0.7).	2.00	2,800.00
Ogrey, S.	10/06/21	Revise insurance correspondence tracking sheet re missing correspondence sent from Reed Smith.	.30	69.00
Ogrey, S.	10/06/21	Communicate with L. Fastenau and S. Colcock re upcoming policy stipulation emails.	.20	46.00
Fastenau, L.	10/06/21	Prepare Liberty Mutual policies for review and comparison.	1.10	346.50
Fastenau, L.	10/06/21	Review and compare AGLIC policies with produced versions.	2.70	850.50
Fastenau, L.	10/06/21	Review and compare Liberty Mutual policies with produced versions.	3.70	1,165.50
Carey, C.	10/06/21	Continue reviewing Issue #32 materials.	5.80	2,465.00
Carey, C.	10/06/21	Confer with M. Rush re status of document review.	.30	127.50
Sraders, S.	10/06/21	Review policy language re Issues #3 and #44.	1.40	805.00
Sraders, S.	10/06/21	Draft memorandum re Issue #3.	2.00	1,150.00
Sraders, S.	10/06/21	Review correspondence re discovery.	.40	230.00
Kaminsky, E.	10/06/21	Draft memorandum re insurance recovery.	1.20	600.00
Kaminsky, E.	10/06/21	Draft memorandum re Issue #1.	3.60	1,800.00
Shore, R.	10/07/21	Confer with R. Leveridge re discovery responses (0.4); review draft of proposed settlement demands and note to client re same (0.3); revise same (1.0); confer with team re litigation status and strategy (0.8).	2.50	3,375.00
Hudson, J.	10/07/21	Confer with team re litigation strategy.	.80	580.00
Girgenti, J.	10/07/21	Confer with team re case update.	.80	292.00
Girgenti, J.	10/07/21	Continue reviewing and issue tagging Navigators document production for relevance and responsive documents.	5.90	2,153.50
Rubinstein, J.	10/07/21	Analyze status of pending discovery projects (0.7); communications with A. Gaske re policy comparison project (0.3); confer with team re litigation strategy (0.8); revise sets of discovery responses to National Union (0.2); revise discovery responses (3.5).	5.50	4,400.00
Rush, M.	10/07/21	Confer with team re case status and strategy.	.80	540.00
Rush, M.	10/07/21	Draft letter to insurers re insurers' discovery responses.	2.60	1,755.00
Rush, M.	10/07/21	Review policies in connection with analyzing Issues #14 and #32.	1.80	1,215.00

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Name	Date	Services	Hours	Amount
Johnson, K.	10/07/21	Confer with A. Gaske, S. Sraders, E. Kaminsky, S. Colcock, S. Ogrey, and L. Fastenau) re status of policy review project.	.30	69.00
Johnson, K.	10/07/21	Confer with J. Rubinstein, R. Leveridge, J. Hudson, R. Shore, M. Rush, C. Carey, J. Girgenti, A. Gaske, S. Sraders, E. Kaminsky, L. Fastenau, and A. Bonesteel re litigation status and strategy.	.80	184.00
Johnson, K.	10/07/21	Confer with L. Fastenau re policy review in preparation for final stipulations (0.3); confer with S. Sraders re missing policies (0.2); draft policy comparisons re NA Elite (3.1).	3.60	828.00
Bonesteel, A.	10/07/21	Confer with R. Leveridge, J. Hudson, M. Rush, A. Gaske, J. Girgenti, S. Sraders, R. Shore, E. Kaminsky, L. Fastenau and K. Johnson re status and strategy.	.70	220.50
Gaske, A.	10/07/21	Confer with E. Kaminsky, S. Sraders, K. Johnson, S. Ogrey, S. Colcock and L. Fastenau re upcoming projects.	.30	172.50
Gaske, A.	10/07/21	Communicate with J. Rubinstein re policy comparison project.	.30	172.50
Gaske, A.	10/07/21	Confer with team re litigation strategy and update.	.80	460.00
Leveridge, R.	10/07/21	Communication with R. Shore re follow-up response to Navigators (0.9); communications with co-counsel and opposing counsel re same (0.9).	1.80	2,520.00
Leveridge, R.	10/07/21	Confer with team re litigation status and strategy (0.8); confer with R. Shore re discovery status (0.4).	1.20	1,680.00
Leveridge, R.	10/07/21	Communications with J. Hudson and J. Rubinstein re responses to NAE requests for admissions (0.3); review and revise same (0.6); communications with co-counsel re same (0.3).	1.20	1,680.00
Ogrey, S.	10/07/21	Confer with L. Fastenau re emails for policy stipulation (0.3); confer with team re policy review project (0.3).	.60	138.00
Ogrey, S.	10/07/21	Draft policy stipulation emails to litigating insurers.	1.10	253.00
Fastenau, L.	10/07/21	Draft policy stipulation emails to AGLIC, National Union, Liberty Mutual, Aspen, and Gulf.	.60	189.00
Fastenau, L.	10/07/21	Review and compare Liberty Mutual policies with produced versions.	3.80	1,197.00
Fastenau, L.	10/07/21	Confer with S. Ogrey re policy stipulation emails.	.30	94.50
Fastenau, L.	10/07/21	Confer with K. Johnson re policy review re stipulations.	.30	94.50
Fastenau, L.	10/07/21	Confer with team re discovery and policy stipulation.	.30	94.50

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Name	Date	Services	Hours	Amount
Carey, C.	10/07/21	Communicate with M. Rush, S. Sraders, and J. Girgenti re Issue #32.	.60	255.00
Carey, C.	10/07/21	Confer with team re case status and strategy.	.80	340.00
Carey, C.	10/07/21	Analyze Issue #32 materials.	5.80	2,465.00
Sraders, S.	10/07/21	Confer with team re policy review project.	.30	172.50
Sraders, S.	10/07/21	Confer with litigation team re discovery and ongoing research memoranda.	.80	460.00
Sraders, S.	10/07/21	Draft memorandum re Issue #3.	.50	287.50
Sraders, S.	10/07/21	Analyze policies re Issue #3.	2.60	1,495.00
Colcock, S.	10/07/21	Confer with A. Gaske, S. Sraders, E. Kaminsky, K. Johnson, L. Fastenau, and S. Ogrey re policy review.	.30	99.00
Kaminsky, E.	10/07/21	Confer with team re litigation status.	.80	400.00
Kaminsky, E.	10/07/21	Confer with team re policy review status.	.30	150.00
Kaminsky, E.	10/07/21	Continue drafting memorandum re Issue #1.	3.00	1,500.00
Rubinstein, J.	10/08/21	Review insurance findings citation support chart prepared by S. Sraders (0.4); revise draft deficiency letter (1.5); revise sets of discovery responses (0.9); participate in meet-and-confer with insurer and co-plaintiff counsel re insurance ESI search terms (0.7); analyze order of strategic research issues (0.4); provide revisions to discovery responses to NAE requests for admission (0.5).	4.40	3,520.00
Rush, M.	10/08/21	Revise letter to insurers re discovery deficiencies.	5.20	3,510.00
Gaske, A.	10/08/21	Confer with AGLIC and Steadfast re discovery search terms.	.70	402.50
Gaske, A.	10/08/21	Review revised responses to National Union discovery requests.	.20	115.00
Gaske, A.	10/08/21	Review Liberty document requests.	.10	57.50
Leveridge, R.	10/08/21	Draft offensive discovery (0.9); review and revise template deficiency letter to insurers (0.7).	1.60	2,240.00
Leveridge, R.	10/08/21	Review communication from Liberty counsel re discovery directed to plaintiffs.	.20	280.00
Leveridge, R.	10/08/21	Draft responses to discovery from insurers (1.9); communications with Debtors' counsel re same (0.4); review communications with insurers re search terms (0.4).	2.70	3,780.00
Ogrey, S.	10/08/21	Update counsel contacts for policy stipulation emails.	.30	69.00
Carey, C.	10/08/21	Communicate with team re Issue #32 strategy.	.50	212.50
Carey, C.	10/08/21	Analyze materials re Issue #32 review.	3.80	1,615.00
Sraders, S.	10/08/21	Analyze policy language re Issue #3.	2.70	1,552.50

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Name	Date	Services	Hours	Amount
Sraders, S.	10/08/21	Research re Issue #3.	1.40	805.00
Sraders, S.	10/08/21	Review draft letter re deficiencies in insurer document productions.	.30	172.50
Kaminsky, E.	10/08/21	Draft memoranda re Issue #25 and #55.	2.10	1,050.00
Hudson, J.	10/09/21	Revise responses to multiple sets of discovery requests defendant insurers.	.20	145.00
Hudson, J.	10/09/21	Revise responses to discovery requests from National Union.	1.10	797.50
Leveridge, R.	10/09/21	Review discovery requests from insurers to committee plaintiffs (0.8); communications with UCC counsel re same (0.4).	1.20	1,680.00
Kaminsky, E.	10/09/21	Research re Issue #25.	.40	200.00
Rubinstein, J.	10/10/21	Revise responses to National Union requests for production (3.1); communications with Debtors' counsel (0.3); review Liberty requests to AHC (0.5).	3.90	3,120.00
Leveridge, R.	10/10/21	Communicate with J. Rubinstein and J. Hudson re comments on discovery responses to National Union (0.5); revise same (1.4); review communication with Debtors' counsel re same (0.3).	2.20	3,080.00
Shore, R.	10/11/21	Review and revise responses to insurer discovery requests.	4.40	5,940.00
Hudson, J.	10/11/21	Review responses to multiple sets of discovery requests from defendants.	.20	145.00
Rubinstein, J.	10/11/21	Communicate with team re discovery issues (0.2); communicate with litigation team re issues analysis (0.2); revise discovery responses (0.9); review correspondence with AHC co-counsel (0.2).	1.50	1,200.00
Leveridge, R.	10/11/21	Draft defensive discovery (1.5); communications with Debtors' counsel re same (0.8).	2.30	3,220.00
Carey, C.	10/11/21	Communicate with M. Rush and J. Girgenti re Issue #32.	.40	170.00
Carey, C.	10/11/21	Review documents re Issue #32.	2.20	935.00
Shore, R.	10/12/21	Confer with litigation team re discovery responses.	.70	945.00
Hudson, J.	10/12/21	Confer with Debtors (Reed Smith) re responses to insurers' discovery requests.	.60	435.00
Hudson, J.	10/12/21	Revise responses to discovery requests from Aspen and North American Elite.	1.60	1,160.00
Hudson, J.	10/12/21	Confer with litigation team re responding to insurers' most recent set of requests.	.70	507.50

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Name	Date	Services	Hours	Amount
Girgenti, J.	10/12/21	Continue to review and issue tag Navigators document production for relevance and responsive documents (3.1); analyze and issue tag Liberty document production for relevance and responsive documents (4.3).	7.40	2,701.00
Rubinstein, J.	10/12/21	Revise discovery responses (5.2); confer with litigation team re responding to discovery requests (0.7); communicate with team re deficiency letter to insurers (0.2); confer with Debtors' insurance counsel discovery responses (0.6); review correspondence from Gulf / St. Paul counsel (0.2); review correspondence from Liberty counsel attaching discovery requests to Committees (0.1).	7.00	5,600.00
Rush, M.	10/12/21	Review insurer document productions.	.80	540.00
Johnson, K.	10/12/21	Confer with A. Gaske re Insurers #15 and #27 productions.	.10	23.00
Johnson, K.	10/12/21	Review and organize productions and discovery pleadings from Insurers #15 and #27.	.60	138.00
Johnson, K.	10/12/21	Confer with D. Lopez re policy review in preparation for final stipulations re Insurer #23.	.30	69.00
Johnson, K.	10/12/21	Confer with A. Bonesteel, D. Lopez, P. McGlinchey and S. Colcock re policy comparison strategy in preparation for final stipulations re Insurers #18, #19, #20, and #23.	.70	161.00
Johnson, K.	10/12/21	Update case calendar re National Union discovery response deadline.	.10	23.00
Bonesteel, A.	10/12/21	Review Gulf and St. Paul production.	.70	220.50
Bonesteel, A.	10/12/21	Confer with K. Johnson, S. Colcock, D. Lopez and P. McGlinchey re policy comparison in preparation for final stipulations re Insurers #18, #19, and #20.	.80	252.00
Gaske, A.	10/12/21	Review insurer discovery requests.	.30	172.50
Gaske, A.	10/12/21	Analyze Issue #27 re memorandum on same.	.90	517.50
Gaske, A.	10/12/21	Confer with R. Leveridge, J. Hudson, J. Rubinstein, and E. Kaminsky re responding to certain discovery requests.	.70	402.50
Gaske, A.	10/12/21	Review St. Paul and Gulf discovery re accounting for Bates stamped ranges.	.50	287.50
Leveridge, R.	10/12/21	Review and revise draft discovery responses (2.1); confer with litigation team re same (0.7).	2.80	3,920.00
Lopez, D.	10/12/21	Confer with K. Johnson re policy comparison in preparation for final stipulations re NA Elite.	.30	69.00
Lopez, D.	10/12/21	Begin comparing certain policies in preparation for final stipulations re Insurers #18, #19, and #20.	2.60	598.00

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Name	Date	Services	Hours	Amount
Lopez, D.	10/12/21	Confer with A. Bonesteel, K. Johnson, P. McGlinchey and S. Colcock re policy comparison in preparation for final stipulations re Liberty Mutual and NA Elite.	.70	161.00
Fastenau, L.	10/12/21	Review and compare Liberty Mutual policies with produced versions.	6.50	2,047.50
Carey, C.	10/12/21	Review documents re Issue #32.	4.30	1,827.50
Carey, C.	10/12/21	Communicate with M. Rush re Issue #32.	.30	127.50
Sraders, S.	10/12/21	Research re Issue #44.	3.30	1,897.50
Colcock, S.	10/12/21	Confer with K. Johnson, A. Bonesteel, D. Lopez and P. McGlinchey re policy comparison in preparation for final stipulations re Insurers #18, #19, #20 and #23.	.70	231.00
Colcock, S.	10/12/21	Being policy comparison review for Insurer #23.	.50	165.00
McGlinchey, P.	10/12/21	Confer with A. Bonesteel, K. Johnson, D. Lopez, and S. Colcock re policy comparison preparation for final stipulations re Insurers #18, #19, #20, and #23.	.70	136.50
Kaminsky, E.	10/12/21	Confer with litigation team re responding to discovery.	.70	350.00
Kaminsky, E.	10/12/21	Confer with team re strategy.	.20	100.00
Kaminsky, E.	10/12/21	Research case law re discovery.	.80	400.00
Shore, R.	10/13/21	Review request for admissions (0.3); analyze factual support for argument re Issues #27 (0.5).	.80	1,080.00
Hudson, J.	10/13/21	Revise response to National Union discovery-related correspondence.	.40	290.00
Hudson, J.	10/13/21	Revise responses to NA Elite and Aspen requests for admission.	1.50	1,087.50
Hudson, J.	10/13/21	Participate in call (partial) with Debtors (Reed Smith) re response to National Union discovery-related correspondence.	1.10	797.50
Girgenti, J.	10/13/21	Continue analyzing and issue tagging Liberty document production for relevance and responsive documents.	5.00	1,825.00
Rubinstein, J.	10/13/21	Revise draft responses to NAE requests for admission (0.9); revise correspondence to insurer counsel re plaintiffs' productions meet-and-confer discussions (1.7); confer with Debtors' counsel re same (1.7); revise discovery responses to NAE and Aspen (0.5); review correspondence with insurer counsel re ESI search terms (0.2).	5.00	4,000.00
Rush, M.	10/13/21	Revise response to insurers October 4, 2021 letter.	1.20	810.00
Johnson, K.	10/13/21	Review case protective order.	.10	23.00

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Name	Date	Services	Hours	Amount
Johnson, K.	10/13/21	Begin comparison of certain policies re final stipulations with Insurers #18, #19, and #20.	1.20	276.00
Bonesteel, A.	10/13/21	Review and compare certain policies re final stipulations for Insurers #18, #19, and #20.	4.00	1,260.00
Gaske, A.	10/13/21	Review certain insurance policies re memorandum on Issue #27.	2.20	1,265.00
Gaske, A.	10/13/21	Review letter to insurer re discovery disputes.	.20	115.00
Leveridge, R.	10/13/21	Draft response to October 4 letter (2.6); telephone conference with co-counsel re same (0.6).	3.20	4,480.00
Lopez, D.	10/13/21	Continue comparing policies in preparation for stipulations re Insurers #18, #19, and #20.	4.10	943.00
Fastenau, L.	10/13/21	Review and compare Liberty Mutual policies with produced versions.	5.10	1,606.50
Fastenau, L.	10/13/21	Confer with P. McGlinchey re policy review.	.30	94.50
Fastenau, L.	10/13/21	Communicate with S. Sraders re Issue #44 project.	.20	63.00
Fastenau, L.	10/13/21	Draft appendix for Issue #44.	1.90	598.50
Carey, C.	10/13/21	Review materials re Issue #32.	2.20	935.00
Sraders, S.	10/13/21	Correspond with L. Fastenau re chart re Issue #44.	.60	345.00
Sraders, S.	10/13/21	Draft memorandum re Issue #44.	2.90	1,667.50
Colcock, S.	10/13/21	Continue policy comparison review for Insurer #23.	3.30	1,089.00
McGlinchey, P.	10/13/21	Review and compare policies produced by Insurers #18, #19, and #20 (3 policies).	5.30	1,033.50
McGlinchey, P.	10/13/21	Confer with L. Fastenau re policy comparison for Insurers #18, #19, and #20.	.30	58.50
Shore, R.	10/14/21	Analyze status of responses to insurer discovery issues (0.6); confer with J. Rubinstein re defensive discovery (0.3); confer with team re litigation status (0.6).	1.50	2,025.00
Hudson, J.	10/14/21	Confer with Debtors' counsel (Reed Smith) re upcoming meet-and-confer session with insurers.	.60	435.00
Hudson, J.	10/14/21	Confer with team re litigation strategy.	.60	435.00
Hudson, J.	10/14/21	Confer with IT re forensic searches in response to discovery requests.	.30	217.50
Hudson, J.	10/14/21	Revise responses to NA Elite interrogatories.	.20	145.00
Hudson, J.	10/14/21	Confer with Debtors' counsel (Reed Smith) re responses to NA Elite and Aspen requests for admission.	.20	145.00
Girgenti, J.	10/14/21	Confer with team re case update and strategy.	.60	219.00
Girgenti, J.	10/14/21	Continue analysis and issue tagging Liberty document production for relevance and responsive documents.	6.80	2,482.00

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Name	Date	Services	Hours	Amount
Girgenti, J.	10/14/21	Communications with M. Rush, S. Sraders, and C. Carey re status of review of insurer productions.	.20	73.00
Rubinstein, J.	10/14/21	Confer with R. Shore re defensive discovery (0.3); confer with R. Leveridge re multiple discovery projects (0.4); confer with co-plaintiff counsel in preparation for discovery related call with insurer counsel (0.6); analyze status of pending discovery and related projects (0.3); confer with team re litigation strategy (0.6); conference call with insurer counsel re discovery (1.6); review revised versions of letter to insurers re discovery (0.8); review documents relevant to same (2.0); analysis re insurer requests to Committee (0.2).	6.80	5,440.00
Rush, M.	10/14/21	Communicate with team re document production.	.10	67.50
Rush, M.	10/14/21	Confer with team re litigation strategy.	.60	405.00
Rush, M.	10/14/21	Review policies in connection with analyzing Issues #14 and #32.	4.80	3,240.00
Johnson, K.	10/14/21	Confer with R. Leveridge, R. Shore, J. Hudson, J. Rubinstein, M. Rush, C. Carey, A. Gaske, S. Sraders, E. Kaminsky, J. Girgenti, S. Colcock, and A. Bonesteel re status and strategy.	.60	138.00
Johnson, K.	10/14/21	Continue comparing policies for stipulations with Insurers #18, #19, and #20.	4.20	966.00
Bonesteel, A.	10/14/21	Continue policy comparison re Insurers #18, #19, and #20 stipulations.	4.50	1,417.50
Bonesteel, A.	10/14/21	Confer with R. Shore, R. Leveridge, J. Hudson, M. Rush, A. Gaske, J. Girgenti, E. Kaminsky, S. Colcock and K. Johnson re status and strategy.	.70	220.50
Gaske, A.	10/14/21	Communicate with J. Rubinstein re status of policy comparison project.	.20	115.00
Gaske, A.	10/14/21	Confer with litigation team re strategy and next steps.	.60	345.00
Leveridge, R.	10/14/21	Draft letter to insurer counsel responding to October 4 letter (1.4); communications with co-counsel re same (0.4); confer with insurer counsel re defensive discovery issues (0.9).	2.70	3,780.00
Leveridge, R.	10/14/21	Confer with team re case status and strategy.	.60	840.00
Leveridge, R.	10/14/21	Communications with co-counsel re offensive discovery (0.2); communicate with UCC counsel re defensive discovery and scheduling meeting re same (0.3).	.50	700.00
Lopez, D.	10/14/21	Continue policy comparison in preparation for stipulations re Insurers #18, #19, and #20.	4.20	966.00

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Fastenau, L.	10/14/21	Continue to review and compare Liberty Mutual policies with produced versions.	5.50	1,732.50
Carey, C.	10/14/21	Confer with team re litigation status and strategy.	.60	255.00
Carey, C.	10/14/21	Draft summary memorandum of Issue #32 review.	1.90	807.50
Sraders, S.	10/14/21	Communicate with B. Hubbard re allocation of policies.	.30	172.50
Colcock, S.	10/14/21	Confer with M. Rush, K. Johnson, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Girgenti, E. Kaminsky, R. Leveridge and R. Shore re case strategy and updates.	.60	198.00
McGlinchey, P.	10/14/21	Continue reviewing and comparing policies produced by Insurers #18, #19, and #20 (3 policies).	4.80	936.00
Kaminsky, E.	10/14/21	Confer with team re litigation strategy and status.	.60	300.00
Kaminsky, E.	10/14/21	Confer with A. Currin and J. Hudson re discovery searches.	.30	150.00
Kaminsky, E.	10/14/21	Research re Issue #54.	1.60	800.00
Hudson, J.	10/15/21	Confer with co-plaintiffs' counsel re responding to insurers' discovery requests.	.40	290.00
Hudson, J.	10/15/21	Review research in anticipation of insurer arguments.	.10	72.50
Hudson, J.	10/15/21	Revise correspondence to insurers re discovery obligations.	.10	72.50
Girgenti, J.	10/15/21	Continue analyzing and issue tagging Liberty document production for relevance and responsive documents.	7.40	2,701.00
Rubinstein, J.	10/15/21	Confer with Committee counsel re discovery requests served on Committees (0.4); correspond with Debtors' counsel re National Union discovery responses (0.1); communications with Debtors' counsel re NAE discovery responses (0.3).	.80	640.00
Rush, M.	10/15/21	Draft deficiency letters to insurers.	3.90	2,632.50
Rush, M.	10/15/21	Review policies in connection with analyzing Issues #14 and #32.	1.90	1,282.50
Johnson, K.	10/15/21	Continuing comparing certain policies produced by Insurers #18, #19, and #20 re stipulation.	3.50	805.00
Johnson, K.	10/15/21	Review scheduling order.	.20	46.00
Leveridge, R.	10/15/21	Draft discovery responses (2.2); communicate with Debtors' counsel and UCC counsel re same (0.4).	2.60	3,640.00
Leveridge, R.	10/15/21	Communications with co-counsel re offensive discovery.	.40	560.00
Lopez, D.	10/15/21	Continue comparing policies for stipulations re Insurers #18, #19, and #20.	2.00	460.00

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Name	Date	Services	Hours	Amount
Carey, C.	10/15/21	Draft memorandum re Issue #32 research.	2.10	892.50
Carey, C.	10/15/21	Communicate with M. Rush re Issue #32 research and next steps.	.20	85.00
Carey, C.	10/15/21	Research re Issue #32.	4.80	2,040.00
Sraders, S.	10/15/21	Review research re Issue #49.	.40	230.00
Kaminsky, E.	10/15/21	Confer with UCC re discovery	.40	200.00
Shore, R.	10/16/21	Analyze status of insurance recovery efforts.	.20	270.00
Hudson, J.	10/16/21	Review discovery-related correspondence with insurers.	.10	72.50
Leveridge, R.	10/16/21	Draft response to Navigators' counsel re discovery issues.	1.20	1,680.00
Hudson, J.	10/17/21	Review revised responses to discovery requests.	.20	145.00
Rubinstein, J.	10/17/21	Analysis re Rhodes discovery issues (0.8); review various discovery deadlines (0.2); revise discovery responses to National Union (0.6); revise responses to NAE interrogatories (1.1).	2.70	2,160.00
Shore, R.	10/18/21	Review current drafts of discovery responses (0.9); revise trust presentation (1.1).	2.00	2,700.00
Hudson, J.	10/18/21	Confer with Bermuda counsel re arbitration-related questions.	.60	435.00
Hudson, J.	10/18/21	Revise responses to Navigators deficiency communication.	.30	217.50
Hudson, J.	10/18/21	Revise responses to National Union interrogatories.	1.40	1,015.00
Girgenti, J.	10/18/21	Continue reviewing and issue tagging Liberty document production for relevance and responsive documents.	2.50	912.50
Rubinstein, J.	10/18/21	Review R. Leveridge comments to NAE interrogatory responses (0.4); review correspondence re discovery served on Committee (0.3); review R. Leveridge comments to responses to National Union discovery requests (0.2); revise responses to National Union discovery requests (2.0); analysis re offensive discovery projects (1.0); review research re privilege log requirements (0.3).	4.20	3,360.00
Johnson, K.	10/18/21	Review and revise all policy comparison spreadsheets.	1.20	276.00
Johnson, K.	10/18/21	Review and organize Debtors' privilege logs re MDL.	.30	69.00
Leveridge, R.	10/18/21	Telephone conference with Bermuda barrister and J. Hudson re insurance arbitrations.	.70	980.00
Leveridge, R.	10/18/21	Review draft discovery responses.	1.30	1,820.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	10/18/21	Draft additional responses to discovery inquiries from insurers (Navigators, NU, and NAE) (0.7); communications with co-counsel re same (0.4).	1.10	1,540.00
Lopez, D.	10/18/21	Finalize policy comparison re stipulation with Insurers #18, #19, and #20.	1.60	368.00
Carey, C.	10/18/21	Communicate with M. Rush re Issue #32 research.	.20	85.00
Sraders, S.	10/18/21	Research re Issue #44.	.80	460.00
Kaminsky, E.	10/18/21	Research discovery issue and rules of procedure.	3.60	1,800.00
Kaminsky, E.	10/18/21	Draft memorandum re research of Issue #1 and policy review re same.	2.40	1,200.00
Shore, R.	10/19/21	Revise responses to insurers' discovery requests.	3.20	4,320.00
Hudson, J.	10/19/21	Confer with AHC co-counsel re insurers' requests for production to Committees.	1.20	870.00
Hudson, J.	10/19/21	Outline process for responding to remaining discovery requests from insurers.	.20	145.00
Hudson, J.	10/19/21	Finalize responses to National Union discovery requests.	.30	217.50
Hudson, J.	10/19/21	Analyze insurers' requests for production to Committees.	.50	362.50
Hudson, J.	10/19/21	Revise responses to NA Elite and Aspen requests for admissions.	1.50	1,087.50
Hudson, J.	10/19/21	Revise responses to National Union interrogatories.	.80	580.00
Rubinstein, J.	10/19/21	Revise responses to National Union discovery requests (2.1); confer with co-plaintiff counsel re same (0.5); revise discovery responses to NAE (1.4); conferences with AHC co-counsel re requests for production served on AHC (1.0).	5.00	4,000.00
Johnson, K.	10/19/21	Review and organize discovery pleadings re Insurer #24.	.10	23.00
Johnson, K.	10/19/21	Communicate with A. Bonesteel re Marsh production.	.10	23.00
Bonesteel, A.	10/19/21	Review Marsh policies.	1.80	567.00
Gaske, A.	10/19/21	Confer with Debtors' insurance team, R. Leveridge and J. Rubinstein re National Union discovery requests.	.50	287.50
Gaske, A.	10/19/21	Communicate with A. Bonesteel re Marsh productions.	.10	57.50
Gaske, A.	10/19/21	Review history of broker productions.	.40	230.00
Leveridge, R.	10/19/21	Communications with co-counsel for Ad Hoc Committee re discovery requests to Committee (0.3); analyze material re same (0.9).	1.20	1,680.00

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Leveridge, R.	10/19/21	Confer with Debtors' counsel re responses to NU document requests (0.5); review responses to NAE Interrogatories (1.4).	1.90	2,660.00
Sraders, S.	10/19/21	Review draft deficiency letters to insurers.	.10	57.50
Sraders, S.	10/19/21	Continue research re Issue #44.	4.60	2,645.00
Hubbard, B.	10/19/21	Review materials and prior notes related to Issue #33.	1.80	765.00
Shore, R.	10/20/21	Revise current drafts of responses to insurer discovery requests.	2.90	3,915.00
Hudson, J.	10/20/21	Analyze proof of claim process in connection with discovery obligations.	1.10	797.50
Hudson, J.	10/20/21	Confer with AHC co-counsel (G. Cicero) re proofs of claim process in connection with discovery obligations.	.10	72.50
Hudson, J.	10/20/21	Confer with A. Bonesteel re file search in connection with discovery obligations.	.30	217.50
Hudson, J.	10/20/21	Revise responses to NA Elite interrogatories.	1.00	725.00
Girgenti, J.	10/20/21	Continue analyzing and issue tagging Liberty document production for relevance and responsive documents (0.8); review and issue tag XL document production for relevance and responsive documents (5.6).	6.40	2,336.00
Girgenti, J.	10/20/21	Communications with M. Rush, S. Sraders, and C. Carey re status of review of insurer productions and issues related thereto.	.20	73.00
Rubinstein, J.	10/20/21	Revise deficiency letter to insurers (1.4); review R. Shore edits to discovery responses to NAE/Aspen (0.6); confer with team re recovery strategy (0.4); analyze allocation issue (1.3); review letter re plaintiffs' 5th production (0.1); confer with AHC co-counsel and Debtors' counsel re discovery responses (0.4).	4.20	3,360.00
Rush, M.	10/20/21	Research re Issue #32.	.80	540.00
Rush, M.	10/20/21	Review AGLIC documents.	4.30	2,902.50
Johnson, K.	10/20/21	Review and organize plaintiffs' fifth production materials.	.20	46.00
Bonesteel, A.	10/20/21	Confer with J. Hudson re collection of email related to discovery requests.	.30	94.50
Bonesteel, A.	10/20/21	Review collection of email related to discovery request.	.70	220.50
Gaske, A.	10/20/21	Review and revise policy comparison charts.	3.10	1,782.50
Leveridge, R.	10/20/21	Analyze allocation strategy.	1.20	1,680.00

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Leveridge, R.	10/20/21	Revise defensive discovery (1.1); communications with co-counsel re same (0.8); communications with counsel for UCC re defensive discovery issues (0.7).	2.60	3,640.00
Ogrey, S.	10/20/21	Confer with L. Fastenau and C. Turner re upcoming discovery response tracking sheet.	.50	115.00
Fastenau, L.	10/20/21	Confer with C. Turner and S. Ogrey re discovery response tracking.	.50	157.50
Carey, C.	10/20/21	Communicate with M. Rush, S. Sraders, and J. Girgenti re Issue #32.	.40	170.00
Carey, C.	10/20/21	Analyze materials re Issue #32.	.70	297.50
Sraders, S.	10/20/21	Confer with team re current status of matters and strategy for next steps.	.40	230.00
Sraders, S.	10/20/21	Analyze missing policies from Insurers #20 and #33 productions.	.20	115.00
Sraders, S.	10/20/21	Continue researching Issue #44.	1.30	747.50
Sraders, S.	10/20/21	Analyze Issue #33 strategy.	1.20	690.00
Kaminsky, E.	10/20/21	Confer with team re litigation status and strategy.	.40	200.00
Turner, C.	10/20/21	Confer with S. Ogrey and L. Fastenau re discovery objections tracking.	.50	97.50
Hubbard, B.	10/20/21	Review preliminary factors for Issue #33.	1.50	637.50
Shore, R.	10/21/21	Confer with litigation team re adversary proceeding status and strategy.	1.10	1,485.00
Shore, R.	10/21/21	Revise discovery responses (0.7); revise trustee presentation re insurance (0.8).	1.50	2,025.00
Hudson, J.	10/21/21	Communicate with A. Gaske re research on Issue #27.	.10	72.50
Hudson, J.	10/21/21	Revise responses to NA Elite interrogatories.	.50	362.50
Hudson, J.	10/21/21	Confer with litigation team re offensive and defensive discovery.	1.10	797.50
Hudson, J.	10/21/21	Revise responses to NA Elite requests for admissions.	.60	435.00
Girgenti, J.	10/21/21	Confer with team re litigation status and strategy.	1.10	401.50
Girgenti, J.	10/21/21	Continue analyzing and issue tagging XL document production for relevance and responsive documents.	6.20	2,263.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	10/21/21	Communications with R. Leveridge, J. Hudson, and R. Shore re discovery responses (0.9); revise same (0.8); review status of pending projects (0.2); analysis re policy stipulation project (0.6); review protective order (0.3); confer with M. Rush re substance of insurer productions (0.2); confer with K. Hough re discovery searches (0.2); analysis re non-products issue (0.6); confer with litigation team re strategy (1.1); analysis re proofs of claim (0.8); review correspondence from Gulf and St. Paul counsel re discovery and analyze response thereto (0.4); provide comments on insurance review protocol (0.7).	6.80	5,440.00
Rush, M.	10/21/21	Review insurers' document productions.	5.30	3,577.50
Rush, M.	10/21/21	Confer with team re status and strategy.	1.10	742.50
Rush, M.	10/21/21	Confer with Prime Clerk re claims database.	.50	337.50
Johnson, K.	10/21/21	Correspond with A. Gaske re Debtors' production and policy comparison review in anticipation of stipulation.	.30	69.00
Johnson, K.	10/21/21	Research signed protective orders (1.1); confer with L. Fastenau and S. Colcock re same (0.3).	1.40	322.00
Johnson, K.	10/21/21	Revise production log and index re Debtors' productions.	.70	161.00
Johnson, K.	10/21/21	Confer with L. Fastenau re tracking spreadsheet for discovery responses and objections (1.5); confer with L. Fastenau and C. Turner re same (0.3).	1.80	414.00
Johnson, K.	10/21/21	Confer with R. Leveridge, R. Shore, J. Hudson, J. Rubinstein, M. Rush, C. Carey, J. Girgenti, A. Gaske, S. Sradars, L. Fastenau, S. Colcock, and A. Bonesteel re litigation status and strategy.	1.10	253.00
Bonesteel, A.	10/21/21	Confer with R. Leveridge, R. Shore, J. Hudson, J. Rubinstein, M. Rush, A. Gaske, S. Sradars, L. Fastenau, C. Carey, J. Girgenti, S. Colcock and K. Johnson re status and strategy.	1.10	346.50
Bonesteel, A.	10/21/21	Review collection of email related to discovery request.	.30	94.50
Gaske, A.	10/21/21	Confer with litigation team re discovery strategy and other projects.	1.10	632.50
Gaske, A.	10/21/21	Review research re Issue #27.	.80	460.00
Gaske, A.	10/21/21	Continue to review policy comparison project.	1.00	575.00
Gaske, A.	10/21/21	Communicate with K. Johnson re protective orders.	.20	115.00
Gaske, A.	10/21/21	Review memorandum on related coverage cases as research for memorandum on Issue #27.	.30	172.50
Leveridge, R.	10/21/21	Confer with team re status of adversary proceeding.	1.10	1,540.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	10/21/21	Draft responses to requests for admissions from NAE (2.8); communications with Debtors' counsel and UCC counsel re same (0.4).	3.20	4,480.00
Leveridge, R.	10/21/21	Communications with Debtors' counsel re proofs of claim filed in bankruptcy proceeding (0.6); communications with Prime Clerk re same (0.7); communications with UCC re same (0.3); review material from Prime Clerk website re same (0.8).	2.40	3,360.00
Fastenau, L.	10/21/21	Confer with S. Colcock and K. Johnson re protective orders.	.30	94.50
Fastenau, L.	10/21/21	Confer with K. Johnson re creating spreadsheet tracking discovery objections.	1.50	472.50
Fastenau, L.	10/21/21	Confer with K. Johnson and C. Turner re discovery objections tracking.	.40	126.00
Fastenau, L.	10/21/21	Review instructions, definitions, and plaintiffs' objections to interrogatories for AGLIC and requests for production for Navigators, National Union, and Gulf.	5.60	1,764.00
Fastenau, L.	10/21/21	Confer with K. Johnson and J. Hudson re discovery objections tracking.	.30	94.50
Fastenau, L.	10/21/21	Confer with team re litigation status and strategy.	1.10	346.50
Carey, C.	10/21/21	Analyze materials re Issue #32 review.	3.60	1,530.00
Carey, C.	10/21/21	Confer with team re case strategy and next steps.	1.10	467.50
Sraders, S.	10/21/21	Confer with litigation team re current issues in adversary proceeding and strategy for next steps.	1.10	632.50
Sraders, S.	10/21/21	Confer with Prime Clerk, Reed Smith, Davis Polk, and Gilbert teams re analysis of proofs of claim.	.50	287.50
Sraders, S.	10/21/21	Analyze policy language re Issue #44.	3.50	2,012.50
Colcock, S.	10/21/21	Confer with L. Fastenau and K. Johnson re protective orders.	.30	99.00
Colcock, S.	10/21/21	Confer with M. Rush, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, S. Sraders, J. Girgenti, R. Leveridge, R. Shore, L. Fastenau, A. Bonesteel, and K. Johnson re case strategy and updates.	1.10	363.00
Turner, C.	10/21/21	Confer with K. Johnson and L. Fastenau re discovery objections tracking.	.40	78.00
Turner, C.	10/21/21	Review plaintiffs' objections to interrogatories for Gulf and St. Paul, National Union, and Navigators.	2.10	409.50
Turner, C.	10/21/21	Review plaintiffs' objections to requests for admissions for Gulf and St. Paul, National Union, and Navigators.	.30	58.50
Hubbard, B.	10/21/21	Confer with Prime Clerk re claims data from proofs of claim forms.	.50	212.50

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Name	Date	Services	Hours	Amount
Shore, R.	10/22/21	Review status of draft responses to discovery requests.	.50	675.00
Hudson, J.	10/22/21	Review HIPPA protections re access of claim submissions.	.10	72.50
Hudson, J.	10/22/21	Finalize responses to NA Elite and Aspen discovery requests.	.40	290.00
Girgenti, J.	10/22/21	Review and issue tag XL document production for relevance and responsive documents.	6.50	2,372.50
Rubinstein, J.	10/22/21	Review UCC edits to discovery responses (0.5); analysis re proofs of claim data (0.5); review documents produced by AGLIC (0.4); analysis re Issue #32 (1.4); confer with R. Leveridge re strategy (0.2); confer with insurance team re strategy (0.3); correspond with co-plaintiff counsel, A. Gaske and R. Leveridge re policy stipulation project (0.8); revise review protocol (0.1); review edits to draft deficiency letter (0.2).	4.40	3,520.00
Rush, M.	10/22/21	Communications with team re protective order and PII (0.5); review protective order (0.4).	.90	607.50
Rush, M.	10/22/21	Confer with co-counsel re claims directory and protective order.	.50	337.50
Rush, M.	10/22/21	Research re Issue #32.	.90	607.50
Rush, M.	10/22/21	Analyze research re Issue #17.	.70	472.50
Rush, M.	10/22/21	Revise letters to insurers re discovery deficiencies.	1.50	1,012.50
Rush, M.	10/22/21	Review document review protocol.	.50	337.50
Johnson, K.	10/22/21	Review and organize correspondence from Gulf and St. Paul re discovery responses.	.10	23.00
Johnson, K.	10/22/21	Review discovery responses (2.1); draft master objection document to discovery responses (2.5); confer with C. Turner re entering discovery responses (0.4)	5.00	1,150.00
Gaske, A.	10/22/21	Review draft emails re policy stipulations.	.40	230.00
Gaske, A.	10/22/21	Draft exhibit to memorandum re Issue #27.	.70	402.50
Gaske, A.	10/22/21	Research cases for memorandum on Issue #27.	2.30	1,322.50
Gaske, A.	10/22/21	Draft portion of memorandum on Issue #27 re pertinent cases.	1.00	575.00
Leveridge, R.	10/22/21	Review UCC edits to responses to NAE requests for admissions (1.1); communicate with UCC and Debtors' counsel re same (0.6).	1.70	2,380.00
Leveridge, R.	10/22/21	Communications with counsel for UCC and Debtors' counsel re access to proofs of claim (0.4); review protective orders in bankruptcy case and adversary proceeding re same (1.8).	2.20	3,080.00

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Name	Date	Services	Hours	Amount
Carey, C.	10/22/21	Analyze materials re Issue #32 review.	3.80	1,615.00
Sraders, S.	10/22/21	Confer with Akin Gump, Reed Smith, R. Leveridge, J. Rubinstein, and M. Rush re access to proofs of claim.	.30	172.50
Sraders, S.	10/22/21	Communicate with S. Colcock and R. Leveridge re access to Prime Clerk database.	.20	115.00
Sraders, S.	10/22/21	Draft memorandum re Issue #44.	.40	230.00
Sraders, S.	10/22/21	Research re Issue #44.	1.60	920.00
Sraders, S.	10/22/21	Analyze and compare terms of non-arbitration Bermuda policies.	2.20	1,265.00
Colcock, S.	10/22/21	Draft adversary proceeding team list for Prime Clerk access.	.40	132.00
Turner, C.	10/22/21	Review and note plaintiffs' objections to interrogatories and requests for admissions for Gulf and St. Paul, National Union, AGLIC/Steadfast, and Navigators.	4.10	799.50
Hudson, J.	10/25/21	Review summary of research on Issues #14.	.10	72.50
Girgenti, J.	10/25/21	Continue reviewing and issue tagging XL document production for relevance and responsive documents.	2.30	839.50
Rubinstein, J.	10/25/21	Provide comments on review protocol to co-plaintiff counsel (0.8); review revised deficiency letter (0.2); communications with A. Gaske re policy stipulation project (0.7); communicate with Debtors' counsel re same (0.1); confer with team re strategy (0.2); analysis re discovery letter sent by Gulf counsel (0.2); analysis re governmental claims (0.3).	2.50	2,000.00
Rush, M.	10/25/21	Revise deficiency letters.	1.50	1,012.50
Rush, M.	10/25/21	Research re Issue #14.	1.10	742.50
Johnson, K.	10/25/21	Review Debtors' insurance documents.	.30	69.00
Johnson, K.	10/25/21	Review discovery responses (0.7); draft master objection document to discovery responses (2.2).	2.90	667.00
Gaske, A.	10/25/21	Communicate with J. Rubinstein re policy comparison project.	.40	230.00
Gaske, A.	10/25/21	Communicate with S. Sraders re memorandum on Issue #44.	.20	115.00
Gaske, A.	10/25/21	Revise draft emails to insurers re policy stipulation (0.8); review policy comparison spreadsheet re arbitration provisions (0.2).	1.00	575.00
Gaske, A.	10/25/21	Draft memorandum on Issue #27.	1.60	920.00
Leveridge, R.	10/25/21	Analyze defensive discovery issues (1.4); review correspondence from insurer counsel re same (0.4); analyze offensive discovery issues (0.3).	2.10	2,940.00

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Fastenau, L.	10/25/21	Review and note plaintiffs' answers to requests for admissions for AGLIC.	2.30	724.50
Sraders, S.	10/25/21	Analyze policy language re Issues #34 and #44.	2.60	1,495.00
Kaminsky, E.	10/25/21	Draft memorandum on research Issue #1.	2.30	1,150.00
Shore, R.	10/26/21	Analyze options for defensive discovery.	1.50	2,025.00
Hudson, J.	10/26/21	Analyze application of batch clauses.	.60	435.00
Hudson, J.	10/26/21	Confer with plaintiffs' co-counsel re responding to insurers' discovery letter to Judge Drain.	.50	362.50
Hudson, J.	10/26/21	Review status of defensive discovery.	.20	145.00
Hudson, J.	10/26/21	Confer with R. Leveridge and J. Rubinstein re strategy for defensive discovery.	.80	580.00
Hudson, J.	10/26/21	Analyze process for collecting and reviewing potentially responsive AHC documents in adversary proceeding.	.60	435.00
Girgenti, J.	10/26/21	Analyze and issue tag XL document production for relevance and responsive documents (2.1); review and issue tag National Union document production for relevance and responsive documents (1.6).	3.70	1,350.50
Rubinstein, J.	10/26/21	Confer with S. Sraders re Issue #44 (0.7); analysis re Issue #14 (0.2); confer with R. Leveridge and J. Hudson re discovery issues (0.8); correspond with Debtors' counsel re response to insurer discovery correspondence (0.1); review Debtors' counsel edits to draft deficiency letter (0.2); analyze insurer letter to Judge Drain re discovery (0.7); confer with R. Leveridge re same (0.3); begin compiling response to same (0.5); confer with Debtors' counsel and Gilbert team re same (0.5); review certain plan provisions (0.2); review insurance custodian list provided by Debtors to insurers (0.2); revise separate correspondence to insurers re policy stipulations and transmit same (1.0).	5.40	4,320.00
Rush, M.	10/26/21	Research re Issue #14.	.70	472.50
Rush, M.	10/26/21	Revise deficiency letters.	1.30	877.50
Rush, M.	10/26/21	Review insurers' letter to Court re discovery deficiencies.	.40	270.00
Rush, M.	10/26/21	Review research re Issue #32.	2.00	1,350.00
Rush, M.	10/26/21	Confer with co-counsel re response to insurers' letter to Court.	.50	337.50
Johnson, K.	10/26/21	Confer with S. Sraders re revising coverage charts (0.9); review and organize existing coverage charts (0.4).	1.30	299.00
Bonesteel, A.	10/26/21	Confer with K. Hough re collection of email related to discovery requests.	.50	157.50

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Name	Date	Services	Hours	Amount
Gaske, A.	10/26/21	Revise draft emails to insurers re policy stipulations pursuant to J. Rubinstein comments.	.30	172.50
Leveridge, R.	10/26/21	Review letter to Court from insurer counsel (0.8); communications with Reed Smith re same (1.1).	1.90	2,660.00
Leveridge, R.	10/26/21	Confer with J. Rubinstein and J. Hudson re defensive discovery (0.8); communicate with S. Gilbert re same (0.3); review separate letter re defensive discovery issues from Gulf and St. Paul (0.4); review previous responses (0.7); communicate with Debtors' counsel re same (0.2).	2.40	3,360.00
Fastenau, L.	10/26/21	Review and note plaintiffs' answers to requests for admissions for Gulf, Aspen, and NA Elite.	4.60	1,449.00
Fastenau, L.	10/26/21	Revise tracking sheet for discovery responses and objections.	.70	220.50
Carey, C.	10/26/21	Draft summary memorandum re Issue #32 review.	1.90	807.50
Carey, C.	10/26/21	Communicate with M. Rush, S. Sraders, and J. Girgenti re Issue #32.	.50	212.50
Carey, C.	10/26/21	Review Issue #32 discovery responses and objections.	.80	340.00
Sraders, S.	10/26/21	Confer with J. Rubinstein re Issue #44.	.70	402.50
Sraders, S.	10/26/21	Review letter from AGLIC and Steadfast re discovery.	.10	57.50
Sraders, S.	10/26/21	Analyze policies and related correspondence from Insurers #15, #24, and #36.	2.80	1,610.00
Sraders, S.	10/26/21	Confer with K. Johnson re updates to coverage charts.	.90	517.50
Sraders, S.	10/26/21	Analysis re Issue #44.	.30	172.50
Kaminsky, E.	10/26/21	Confer with J. Hudson re discovery.	.30	150.00
Kaminsky, E.	10/26/21	Confer with J. Hudson re insurer agreement with Debtors' review.	.40	200.00
Shore, R.	10/27/21	Review and provide comments re letter to Judge Drain responding to insurer letter re discovery issues.	.30	405.00
Hudson, J.	10/27/21	Revise response to insurers' discovery-related letter to Judge Drain.	1.00	725.00
Hudson, J.	10/27/21	Confer with A. Gaske re drafting responses to document requests to Committees.	.30	217.50
Hudson, J.	10/27/21	Confer with E. Kaminsky, A. Bonesteel and K. Hough re discovery requests.	.40	290.00
Hudson, J.	10/27/21	Analyze options for collecting and reviewing potentially responsive AHC documents in adversary proceeding.	.70	507.50

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Name	Date	Services	Hours	Amount
Hudson, J.	10/27/21	Analyze proofs of claim for reference in adversary proceeding.	.20	145.00
Girgenti, J.	10/27/21	Analyze and issue tag National Union document production for relevance and responsive documents.	1.10	401.50
Rubinstein, J.	10/27/21	Review second set of interrogatories served by Navigators (0.2); revise response letter to Court re discovery and review proposed edits by others (1.2); review correspondence re document production in response to insurer requests (0.5); analysis re experts (0.9); analyze policy comparisons and correspond with insurer and UCC counsel re policy stipulation project (1.3); draft response to Gulf and St. Paul discovery letter (3.0).	7.10	5,680.00
Rush, M.	10/27/21	Review draft response to insurers' letter to Court.	.50	337.50
Rush, M.	10/27/21	Research for potential experts.	.80	540.00
Rush, M.	10/27/21	Review research re Issue #32.	2.00	1,350.00
Johnson, K.	10/27/21	Draft policy review spreadsheet re Exhibit A policies.	.10	23.00
Johnson, K.	10/27/21	Revise Bermuda and CGL coverage charts re at-issue policies.	.10	23.00
Johnson, K.	10/27/21	Revise CGL and Bermuda coverage charts and policy tracking spreadsheet to reflect those cases not in the complaint and those in arbitration (3.1); confer with S. Sraders and S. Ogrey re same (0.7).	3.80	874.00
Bonesteel, A.	10/27/21	Confer with K. Hough re collection of email related to discovery requests.	1.00	315.00
Bonesteel, A.	10/27/21	Confer with J. Hudson, E. Kaminsky and K. Hough re collection of email related to discovery requests.	.40	126.00
Gaske, A.	10/27/21	Review XLIA, Navigators, and Liberty Mutual policy comparison spreadsheet in preparation for call on potential policy stipulation.	.50	287.50
Gaske, A.	10/27/21	Confer with J. Hudson re discovery requests to the AHC and UCC.	.30	172.50
Gaske, A.	10/27/21	Begin drafting responses to requests directed at the Committees.	1.40	805.00
Leveridge, R.	10/27/21	Draft response to insurers' letter to Judge re discovery issues (1.6); communications with co-counsel re same (0.5); review finalized letter (0.3).	2.40	3,360.00
Leveridge, R.	10/27/21	Review material from Ad Hoc Committee co-counsel re discovery directed to Committees.	1.20	1,680.00
Leveridge, R.	10/27/21	Review academic article potentially relevant to adversary proceeding.	1.40	1,960.00

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Leveridge, R.	10/27/21	Review draft response to insurers' October 21 discovery letter (0.3); review communications with co-counsel re same (0.2).	.50	700.00
Ogrey, S.	10/27/21	Review policies listed on exhibit 1 to complaint for upcoming update to coverage charts.	.10	23.00
Ogrey, S.	10/27/21	Revise CGL and Bermuda coverage charts to reflect those cases not in the complaint and those in arbitration (2.6); confer with S. Sraders and K. Johnson re same (0.7).	3.30	759.00
Sraders, S.	10/27/21	Analyze coverage under policies from Insurers #15, #24, and #36.	1.70	977.50
Sraders, S.	10/27/21	Confer with K. Johnson and S. Ogrey re coverage chart revisions.	.70	402.50
Sraders, S.	10/27/21	Review various expert reports filed in opioid and other mass tort contexts.	1.20	690.00
Kaminsky, E.	10/27/21	Confer with J. Hudson, A. Bonesteel, and K. Hough re discovery collection.	.40	200.00
Shore, R.	10/28/21	Confer with team re status, strategy, next steps.; review confer with J. Hudson re insurance presentation for J. Peacock; confer with S. Gilbert re same; confer with J. Rubinstein re policy review.	1.40	1,890.00
Hudson, J.	10/28/21	Confer with AHC co-counsel (G. Cicero) re discovery responses in adversary proceeding.	.50	362.50
Hudson, J.	10/28/21	Confer with team re litigation status and strategy.	.70	507.50
Hudson, J.	10/28/21	Communicate with B. Hubbard re analyzing proof of claim data.	.10	72.50
Hudson, J.	10/28/21	Continue to analyze options for collecting and reviewing potentially responsive AHC documents in adversary proceeding.	.40	290.00
Hudson, J.	10/28/21	Revise response to Gulf and St. Paul deficiency letter.	1.10	797.50
Hudson, J.	10/28/21	Revise responses to discovery propounded on AHC and UCC.	.10	72.50
Girgenti, J.	10/28/21	Confer with M. Rush, S. Sraders, and C. Carey re final status review of produced documents (0.3); confer with team re case update and strategy (0.7).	1.00	365.00
Girgenti, J.	10/28/21	Review and analyze National Union document production for information related to 2001 batch claims notice.	.30	109.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	10/28/21	Communications with team re policy stipulation project (0.4); correspond with various insurance counsel re same (0.3); review status of pending discovery projects (0.4); review emails re document collection / review / production in response to insurer discovery requests (0.5); review C. Carey memoranda re Issue #32 (0.3); analyze expert analysis relevant to Issue #32 (2.5); confer with AHC co-counsel, R. Leveridge, J. Hudson, and B. Hubbard re discovery re same (1.1); confer with team re litigation strategy (0.7); confer with R. Leveridge re strategy (0.2); revise response letter to Gulf / St. Paul re discovery (0.8); review defense cost data produced by Debtor to Navigators re Rhodes (0.2).	7.40	5,920.00
Rush, M.	10/28/21	Research re potential experts.	1.50	1,012.50
Rush, M.	10/28/21	Review research re Issue #32 (1.2); confer with S. Sraders, J. Girgenti and C. Carey re document review (0.3).	1.50	1,012.50
Rush, M.	10/28/21	Confer with team re case status and strategy.	.70	472.50
Bonesteel, A.	10/28/21	Confer with K. Hough re collection of email related to discovery requests.	1.00	315.00
Bonesteel, A.	10/28/21	Confer with R. Leveridge, R. Shore, J. Hudson, J. Rubinstein, S. Sraders, M. Rush, A. Gaske, E. Kaminsky, S. Ogrey, C. Carey, J. Girgenti, and S. Colcock re status and strategy.	.70	220.50
Gaske, A.	10/28/21	Draft discovery responses for responses directed to AHC and UCC re general objections and objections to instructions.	2.10	1,207.50
Gaske, A.	10/28/21	Confer with team re insurance recovery strategy and status.	.70	402.50
Gaske, A.	10/28/21	Review memorandum on Issue #20.	.20	115.00
Leveridge, R.	10/28/21	Communications with co-counsel re defensive discovery (0.9); review and revise letter to opposing counsel re same (0.8); conference with Judge Drain re same (2.1).	3.80	5,320.00
Leveridge, R.	10/28/21	Confer with team re adversary litigation strategy.	.70	980.00
Leveridge, R.	10/28/21	Communicate with Prime Clerk re proofs of claim material (0.4); review communications from team re same (0.3).	.70	980.00
Ogrey, S.	10/28/21	Confer with M. Rush, S. Sraders, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, S. Colcock J. Girgenti, E. Kaminsky, R. Leveridge and R. Shore re case strategy and updates.	.70	161.00

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Name	Date	Services	Hours	Amount
Carey, C.	10/28/21	Communicate with M. Rush, S. Sraders, and J. Girgenti re Issue #32.	.30	127.50
Carey, C.	10/28/21	Analyze materials re Issue #32.	4.00	1,700.00
Carey, C.	10/28/21	Confer with team re case strategy.	.70	297.50
Sraders, S.	10/28/21	Confer with team re ongoing discovery efforts and strategy.	.70	402.50
Sraders, S.	10/28/21	Revise draft coverage charts.	.20	115.00
Sraders, S.	10/28/21	Confer with M. Rush and J. Girgenti re policies issued by Insurer #24.	.30	172.50
Sraders, S.	10/28/21	Analyze expert reports and opinions re opioids.	2.30	1,322.50
Colcock, S.	10/28/21	Confer with M. Rush, S. Ogrey, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Girgenti, E. Kaminsky, R. Leveridge and R. Shore re case strategy and updates.	.70	231.00
Kaminsky, E.	10/28/21	Confer with team re update and strategy.	.70	350.00
Kaminsky, E.	10/28/21	Confer with team re discovery review.	.30	150.00
Kaminsky, E.	10/28/21	Draft memorandum re Issue #54.	1.90	950.00
Hubbard, B.	10/28/21	Confer with G. Cicero and R. Leveridge re proofs of claim data.	.50	212.50
Hubbard, B.	10/28/21	Initial review of proofs of claim reports provided by Prime Clerk.	1.60	680.00
Hudson, J.	10/29/21	Confer with co-plaintiffs' counsel in advance of discovery conference with Court.	.50	362.50
Hudson, J.	10/29/21	Attend discovery conference with Judge Drain.	.80	580.00
Hudson, J.	10/29/21	Analyze proofs of claim evidence for use in adversary proceeding.	.50	362.50
Hudson, J.	10/29/21	Confer with S. Sraders and B. Hubbard re proof of claim evidence.	.30	217.50
Hudson, J.	10/29/21	Continue analyzing options for collecting and reviewing potentially responsive AHC documents in adversary proceeding.	.30	217.50
Rubinstein, J.	10/29/21	Analysis re proofs of claim (1.0); communicate with team re policy stipulation analysis (0.2); review expert reports related to Issue #32 (0.8); confer with R. Shore re client presentation (0.2); confer with Debtors' counsel re discovery conference with Court (0.5); review correspondence re documents filed under seal (0.4); confer with insurance team re strategy (0.4); correspond with Debtors' counsel re document review (0.7); participate in Court conference re discovery (0.9).	5.10	4,080.00
Rush, M.	10/29/21	Review claims submission forms.	.50	337.50

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Name	Date	Services	Hours	Amount
Rush, M.	10/29/21	Confer with C. Carey re research related to Issue #32.	.30	202.50
Rush, M.	10/29/21	Attend conference with Court re defendants' discovery letter.	.80	540.00
Bonesteel, A.	10/29/21	Communicate with Lighthouse (potential discovery vendor) re upcoming email review (0.8); communicate with Cobra (potential discovery vendor) re upcoming email review (0.8); communicate with Consilio (potential discovery vendor) re upcoming email review (0.8); review proposals from same (1.7); confer with J. Hudson and K. Hough re same (0.9).	5.00	1,575.00
Gaske, A.	10/29/21	Communicate with J. Rubinstein re process for reviewing policy discrepancies among policy versions.	.20	115.00
Gaske, A.	10/29/21	Draft discovery responses for discovery directed at the Committees re definition objections and responses sections.	4.00	2,300.00
Leveridge, R.	10/29/21	Participate in discovery conference with Judge Drain (0.8); review materials in preparation for conference with the Court (2.0); communications with co-counsel re same (0.6).	3.40	4,760.00
Leveridge, R.	10/29/21	Review outstanding items re defensive discovery.	1.40	1,960.00
Carey, C.	10/29/21	Confer with M. Rush re Issue #32 research.	.50	212.50
Carey, C.	10/29/21	Review Issue #32 research.	.50	212.50
Sraders, S.	10/29/21	Analyze policies and related correspondence from Insurer #24.	1.00	575.00
Sraders, S.	10/29/21	Confer with J. Hudson and B. Hubbard re proofs of claim data.	.30	172.50
Sraders, S.	10/29/21	Review MDL expert reports.	.80	460.00
Hubbard, B.	10/29/21	Confer with J. Hudson and S. Sraders re proofs of claim data.	.30	127.50
Hudson, J.	10/31/21	Revise request for admissions responses	.40	290.00
Rubinstein, J.	10/31/21	Revise response letter to Gulf and St. Paul re discovery.	.50	400.00
Sraders, S.	10/31/21	Review policies issued by Insurers #5, #24, and #36.	2.00	1,150.00
Sraders, S.	10/31/21	Continue reviewing MDL expert reports.	.50	287.50
Project Total:			840.00	\$ 525,603.50
TOTAL CHARGEABLE HOURS			1,005.30	
TOTAL FEES				\$ 699,910.00

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TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	49.50	1,700.00	84,150.00
Quinn, K.	2.70	1,100.00	2,970.00
Shore, R.	45.60	1,350.00	61,560.00
Holland, P.	1.70	290.00	493.00
Hudson, J.	58.30	725.00	42,267.50
Neely, M.	5.80	625.00	3,625.00
Girgenti, J.	87.60	365.00	31,974.00
Grim, E.	5.60	700.00	3,920.00
Rubinstein, J.	110.50	800.00	88,400.00
Wolf, D.	7.50	700.00	5,250.00
Rush, M.	83.00	675.00	56,025.00
Johnson, K.	57.40	230.00	13,202.00
Bonesteel, A.	24.20	315.00	7,623.00
Gaske, A.	44.60	575.00	25,645.00
Leveridge, R.	101.30	1,400.00	141,820.00
Lopez, D.	15.50	230.00	3,565.00
Ogrey, S.	13.60	230.00	3,128.00
Fastenau, L.	57.60	315.00	18,144.00
Carey, C.	66.90	425.00	28,432.50
Sraders, S.	82.90	575.00	47,667.50
Colcock, S.	10.30	330.00	3,399.00
McGlinchey, P.	11.10	195.00	2,164.50
Kaminsky, E.	35.90	500.00	17,950.00
Lloyd, M.	6.00	195.00	1,170.00
Turner, C.	14.00	195.00	2,730.00
Hubbard, B.	6.20	425.00	2,635.00
TOTALS	1,005.30		\$ 699,910.00

TASK SUMMARY

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	27.50	23,664.00
A004	Case Administration	12.60	2,457.00
A006	Employment / Fee Applications	1.70	493.00
A009	Meetings / Communications with AHC & Creditors	4.90	4,572.50
A019	Plan of Reorganization / Disclosure Statement	118.60	143,120.00
A020	Insurance Adversary Proceeding	840.00	525,603.50

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EXPENSE DETAILS

E106: Online Research

Date	Description	Task	Amount
10/31/21	Westlaw	E106	1,818.99
	Sub-Total of Expenses:		\$ 1,818.99
	TOTAL EXPENSES		\$ 1,818.99
	TOTAL FEES AND EXPENSES		\$ 701,728.99